

CLERK U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
LUBBOCK DIVISION

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION

2023 MAR -8 PM 12: 04

DEPUTY CLERK 786

UNITED STATES OF AMERICA

v.

CASSANDRA GONZALEZ (01)  
IMAJAH TIERRA CERVANTES (02)

**5 - 23 CR - 014 - H**  
NO. \_\_\_\_\_

**INDICTMENT**

The Grand Jury Charges:

Count One

Straw Purchasing of a Firearm  
(Violation of 18 U.S.C. § 932(b)(3), 932(c)(1))

From on or about December 30, 2022, to on or about January 4, 2023, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Cassandra Gonzalez and Imajah Tierra Cervantes**, defendants, did knowingly purchase and conspire to purchase a firearm, to wit: an FNH USA, Model M249S, 5.56x45mm belt-fed rifle, serial number M249SA06305, in and otherwise affecting interstate and foreign commerce, for, on behalf of, at the request of, and at the demand of L.V., knowing and having reasonable cause to believe that L.V. intended to sell and otherwise dispose of the firearm in furtherance of a felony, a Federal crime of terrorism, and a drug trafficking crime, as those terms are defined in Title 18, United States Code, Section 932(a).

In violation of Title 18, United States Code, Sections 932(b)(3), 932(c)(1), and 2.

Count Two

False Material Statement During the Purchase of a Firearm  
(Violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2))

On or about December 30, 2022, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Cassandra Gonzalez**, defendant, in connection with the acquisition and attempted acquisition of a firearm, that is, an FNH USA, Model M249S, 5.56x45mm belt-fed rifle, serial number M249SA06305, from SharpShooters, 5220 Marsha Sharp Freeway, Lubbock, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to SharpShooters, which statement was intended and likely to deceive SharpShooters, as to a fact material to the lawfulness of such sale and acquisition of said firearm under chapter 44 of Title 18, in that defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction Record to the effect she was the actual transferee and buyer of the firearm, when she was knowingly and intentionally acquiring the firearm on behalf of another person, to wit: L.V..

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

Count Three

**False Material Statement During the Purchase of a Firearm  
(Violation of 18 U.S.C. §§ 922(a)(6), 924(a)(2))**

On or about December 30, 2022, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Imajah Tierra Cervantes**, defendant, in connection with the acquisition and attempted acquisition of a firearm, that is, an FNH USA, Model M249S, 5.56x45mm belt-fed rifle, serial number M249SA06255, from Lone Star Shooting Sports, 6020 43rd Street, Lubbock, Texas, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did knowingly make a false and fictitious written statement to Lone Star Shooting Sports, which statement was intended and likely to deceive Lone Star Shooting Sports, as to a fact material to the lawfulness of such sale and acquisition of said firearm under chapter 44 of Title 18, in that defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 Firearms Transaction Record to the effect that she was the actual transferee and buyer of the firearm, when she was knowingly and intentionally acquiring the firearm on behalf of another person, to wit: L.V.

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

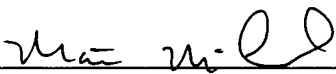
Forfeiture Notice  
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Upon conviction of any of the offenses alleged in this indictment, and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), defendants **Cassandra Gonzalez** and **Imajah Tierra Cervantes** shall forfeit to the United States of America any firearm and ammunition involved in or used in the knowing commission of the offense, including, but not limited to, the following: FNH USA, Model M249S, 5.56x45mm belt-fed rifles, serial numbers M249SA06305 and M249SA06255, and any additional ammunition, magazines, and / or accessories recovered with the firearms.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
MATTHEW A. McLEOD  
Assistant United States Attorney  
Tennessee State Bar No. 034353  
1205 Texas Avenue, Suite 700  
Lubbock, Texas 79401  
Telephone: 806-472-7351  
Facsimile: 806-472-7394  
E-mail: matthew.mcleod@usdoj.gov

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

LUBBOCK DIVISION

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UNITED STATES OF AMERICA

v.

CASSANDRA GONZALEZ (01)  
IMAJAH TIERRA CERVANTES (02)

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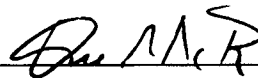
INDICTMENT

COUNT 1: STRAW PURCHASING OF A FIREARM  
Title 18, United States Code, Sections 932(b)(3), 932(c)(1).  
COUNT 2: FALSE MATERIAL STATEMENT DURING THE  
PURCHASE OF A FIREARM  
Title 18, United States Code, Sections 922(a)(6), 924(a)(2).  
COUNT 3: FALSE MATERIAL STATEMENT DURING THE  
PURCHASE OF A FIREARM  
Title 18, United States Code, Sections 922(a)(6), 924(a)(2).  
FORFEITURE NOTICE  
(3 COUNTS + FORFEITURE NOTICE)

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A true bill rendered:

Lubbock



Foreperson

Filed in open court this 8<sup>TH</sup> day of MARCH, A.D. 2023.  
ARREST WARRANT TO ISSUE AS TO EACH DEFENDANT

  
UNITED STATES MAGISTRATE JUDGE